

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

_____X

Chapter 9

IN re:

Case No.: 13-53846

Hon. Thomas J. Tucker

CITY OF DETROIT, MICHIGAN,

Debtor.

_____X

**DELANIA PATTERSON, AS PERSONAL REPRESENTATIVE FOR THE ESTATE OF SHERRILL
TURNER, DECEASED, AND DELANIA PATTERSON, AS NEXT FRIEND FOR ROBERT
TURNER, A MINOR'S OPPOSITION TO CITY OF DETROIT'S MOTION, PURSUANT TO
SECTIONS 105(A) AND 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE
3021, FOR AN ORDER APPROVING RESERVE AMOUNTS FOR CERTAIN DISPUTED OR
UNLIQUIDATED UNSECURED CLAIMS IN CONNECTION WITH DISTRIBUTIONS TO BE
MADE UNDER THE EIGHTH AMENDED PLAN FOR THE ADJUSTMENT OF DEBTS OF THE
CITY OF DETROIT**

NOW COMES Delania Patterson, as Personal Representative for the Estate of Sherrill Turner, Deceased, and Delania Patterson, as Next Friend for Robert Turner, a Minor, by and through her attorneys, Fieger Law, and hereby submits this oppositions to the City of Detroit's Motion PURSUANT TO SECTIONS 105(A) AND 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3021, FOR AN ORDER APPROVING RESERVE AMOUNTS FOR CERTAIN DISPUTED OR UNLIQUIDATED UNSECURED CLAIMS IN CONNECTION WITH DISTRIBUTIONS TO BE MADE UNDER THE EIGHTH AMENDED PLAN FOR THE ADJUSTMENT OF DEBTS OF THE CITY OF DETROIT ("Motion").

RESPONSE

1. Creditor, Delania Patterson, as Personal Representative for the Estate of Sherrill Turner, Deceased, and Delania Patterson, as Next Friend for Robert Turner, a Minor, (hereinafter referred to as "Creditor") filed a lawsuit against Terry Sutton and Sharon Nichols. The case involved two 911 calls placed by Robert Turner, which were received by Sharon Nichols and Terry Sutton, employees of the City of Detroit. The matter in which the 911 calls were handled caused severe emotional distress to Robert Turner, as well as the death of his mother for the delay in providing emergency medical treatment.

2. The designated Bankruptcy claim number for this case is 1522.

3. On February 19, 2014, Patterson/Turner filed their Proof of Claim alleging a loss of ten million dollars (\$10,000,000.00). (**Exhibit A; Proof of Claim**).

4. In reviewing Docket Entry #9351, which is the subject Motion, none of the attachments or schedules identify the Patterson/Turner #1522 as a potential claimant.

5. The City of Detroit's Motion filed on March 3, 2015, pursuant to §105(A) and §502(C) of the Bankruptcy Rule 3021 for an Order Approving Reserve Amounts for Certain Disputed and Unliquidated or Unsecured Claims in Connection with the Distributions to be Made Under the Eighth Amended Plan for the Adjustment of Debts of the City of Detroit is inadequate to properly account for the Patterson/Turner matter.

6. Creditor Patterson/Turner requests that the Court include Claim No. 1522 as an allowed claim number under the applicable rules in the amount of ten million dollars (\$10,000,000.00).

Respectfully submitted,

FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.

/s/James J. Harrington, IV

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Dated: March 23, 2015

Certificate of Service

James J. Harrington, IV, hereby certifies on March 23, 2015, he caused a copy of this document to be served upon all parties of record, and that such service was made electronically upon each counsel of record so registered with the United States Bankruptcy Court E-filing system (CM/ECF).

/s/ James J. Harrington, IV, Esq.